

UNITED STATES DISTRICT COURT U.S. DISTRICT COURT
EASTERN DISTRICT OF WISCONSIN EASTERN DISTRICT - WI
FILED

UNITED STATES OF AMERICA,

2021 NOV -9 A 11: 37

Plaintiff,

SEALED
CLERK OF COURT

v.

Case No. **21-CR-226**

AMINAT OMOTAYO ADENIYI AJAO,

[18 U.S.C. §§ 1014, 1956, 1957, and 2(a)]

Defendant.

INDICTMENT

Allegations Common to All Counts

THE GRAND JURY CHARGES THAT:

1. At all times material to this indictment:
 - a. A business entity titled "Choate Solutions Inc." was registered with the Wisconsin Department of Financial Institutions.
 - b. AMINAT OMOTAYO ADENIYI AJAO, using fraudulent identity documents, opened and attempted to open bank accounts, including Wells Fargo Bank Account ending in 1993 ("Wells Fargo Account #1993"), which was opened in the name of Choate Solutions Inc. at a branch in the Eastern District of Wisconsin.
 - c. AMINAT OMOTAYO ADENIYI AJAO laundered the proceeds of at least one business email compromise (BEC) wire fraud scheme through Wells Fargo Account #1993. A BEC wire fraud scheme is a form of cybercrime in which a fraudster uses false and misleading emails to fraudulently induce a victim to transfer funds to a bank account controlled by the fraudster and the fraudster's accomplices.

d. In December 2019, as a result of a BEC wire fraud scheme, Company A, located in the State of Georgia, transferred substantial sums to Wells Fargo Account #1993.

e. After Company A's funds were transferred to Wells Fargo Account #1993, but before the fraud was discovered, at least thirteen (13) checks were written on the account.

COUNT ONE
(Money Laundering Conspiracy)

THE GRAND JURY FURTHER CHARGES THAT:

2. Beginning by at least August 2018, and continuing through at least January 2019, in the State and Eastern District of Wisconsin and elsewhere,

AMINAT OMOTAYO ADENIYI AJAO

knowingly combined, conspired, and agreed with other persons known and unknown to the Grand Jury to commit offenses against the United States, namely,

a. To knowingly conduct and attempt to conduct financial transactions affecting interstate commerce and foreign commerce, which transactions involved the proceeds of a specified unlawful activity, namely wire fraud, in violation of Title 18, United States Code, Section 1343, knowing that the transactions were designed in whole and in part to conceal and disguise the nature, location, source, ownership, and control of the proceeds of a specified unlawful activity, and knowing that, while conducting and attempting to conduct such financial transactions, the property involved in the financial transactions represented the proceeds of some form of unlawful activity, in violation of Title 18, United States Code, Section 1956(a)(1)(B)(i); and

b. To knowingly engage and attempt to engage in monetary transactions by, through, and to a financial institution, affecting interstate and foreign commerce, in criminally derived property of a value greater than \$10,000, such property having been derived from a specified unlawful activity, namely wire fraud, in violation of Title 18, United States Code, Section 1343, in violation of Title 18, United States Code, Section 1957(a).

All in violation of Title 18, United States Code, Section 1956(h).

COUNTS TWO THROUGH SIX
(Money Laundering)

THE GRAND JURY FURTHER CHARGES THAT:

3. On or about the dates set forth below, in the State and Eastern District of Wisconsin and elsewhere,

AMINAT OMOTAYO ADENIYI AJAO

knowingly conducted and attempted to conduct each of the financial transactions specified below.

4. Each transaction occurred through a financial institution and occurred in and affected interstate commerce.

5. Each transaction involved proceeds of a specified unlawful activity, namely wire fraud, committed in violation of Title 18, United States Code, Section 1343.

6. While conducting each transaction, the defendant knew that the property involved in the transaction represented the proceeds of some form of unlawful activity.

7. While conducting each transaction, the defendant knew that the transaction was designed in whole and in part to conceal and disguise the nature, location, source, ownership, and control of the proceeds of the specified unlawful activity.

<u>Count</u>	<u>Date</u>	<u>Description</u>
Two	December 27, 2018	A check written on Wells Fargo Account #1993 payable to "Omega Global Trucking" for \$135,000, which was deposited on or about January 3, 2019, into JP Morgan Chase Bank Account ending in 9015.
Three	December 27, 2018	A check written on Wells Fargo Account #1993 payable to "Prep Logistics Inc." for \$185,000, which was deposited on or about December 31, 2018, into Bank of America Account ending in 3961.

Four	December 31, 2018	A check written on Wells Fargo Account #1993 payable to "TA Sourcing Inc." for \$650,000, which was deposited on or about January 2, 2019, into Bank of America Account ending in 8402.
Five	January 2, 2019	A check written on Wells Fargo Account #1993 payable to "Allume Collections Inc." for \$82,000, which was attempted for negotiation on or about January 3, 2019, into Regions Bank Account ending in 2348.
Six	January 6, 2019	A check written on Wells Fargo Account #1993 payable to "Paul Allume" for \$200, which was attempted for negotiation on or about January 7, 2019, into TCF Bank Account ending in 3030.

Each in violation of Title 18, United States Code, Sections 1956(a)(1)(B)(i) and 2(a).

COUNTS SEVEN THROUGH TEN
(Unlawful Financial Transactions)

THE GRAND JURY FURTHER CHARGES THAT:

8. On or about the dates set forth below, in the State and Eastern District of Wisconsin and elsewhere,

AMINAT OMOTAYO ADENIYI AJAO

knowingly engaged and attempted to engage in the following monetary transactions by, through, and to a financial institution, affecting interstate and foreign commerce, in criminally derived property of a value greater than \$10,000. The monetary transactions involved the withdrawal and transfer of U.S. currency, such property having been derived from a specified unlawful activity, namely wire fraud, in violation of Title 18, United States Code, Section 1343, each transaction occurring in the United States:

<u>Count</u>	<u>Date</u>	<u>Description</u>
Seven	December 27, 2018	A check written on Wells Fargo Account #1993 payable to "Omega Global Trucking" for \$135,000, which was deposited on or about January 3, 2019, into JP Morgan Chase Bank Account ending in 9015.
Eight	December 27, 2018	A check written on Wells Fargo Account #1993 payable to "Prep Logistics Inc." for \$185,000, which was deposited on or about December 31, 2018, into Bank of America Account ending in 3961.
Nine	December 31, 2018	A check written on Wells Fargo Account #1993 payable to "TA Sourcing Inc." for \$650,000, which was deposited on or about January 2, 2019, into Bank of America ending in 8402.
Ten	January 2, 2019	A check written on Wells Fargo Account #1993 payable to "Allume Collections Inc." for \$82,000, which was attempted for negotiation on or about January 3, 2019, into Regions Bank Account ending in 2348.

Each in violation of Title 18, United States Codes, Sections 1957 and 2(a).

COUNTS ELEVEN THROUGH THIRTEEN
(False Statements to Bank)

THE GRAND JURY FURTHER CHARGES THAT:

9. On or about the dates set forth below, in the State and Eastern District of Wisconsin,

AMINAT OMOTAYO ADENIYI AJAO

knowingly made a false statement for the purpose of influencing the action of Wells Fargo Bank, an institution the accounts of which are insured by the Federal Deposit Insurance Corporation, in connection with an application for an account:

<u>Count</u>	<u>Date</u>	<u>Description</u>	<u>Branch Location</u>
Eleven	August 29, 2018	The defendant presented to a representative of Wells Fargo Bank false information, including a false name and false address.	Milwaukee, WI
Twelve	December 19, 2018	The defendant presented to a representative of Wells Fargo Bank false information, including a false name and false address.	Racine, WI
Thirteen	December 19, 2018	The defendant presented to a representative of Wells Fargo Bank false information, including a false name and false address.	Milwaukee, WI

Each in violation of Title 18, United States Code, Section 1014.

FORFEITURE NOTICE

10. Upon conviction of one or more of the offenses in violation of Title 18, United States Code, Section 1956, set forth in this Indictment, or one or more of the offenses in violation of Title 18, United States Code, Section 1957, set forth in this Indictment, the defendant shall forfeit to the United States of America, pursuant to Title 18, United States Code, Section 982(a)(1), any property, real or personal, involved in such offense, and any property traceable to such property, including, but not limited to, a sum of money equal to the value of the property involved in the offense or offenses of conviction.

11. Upon conviction of the offenses in violation of Title 18, United States Code, Section 1014 set forth in this Indictment, the defendant shall forfeit to the United States of America, pursuant to Title 18, United States Code, Section 982(a)(2)(A), any property constituting, or derived from, proceeds obtained, directly or indirectly, as a result of such violations.

12. If any of the property described above, as a result of any act or omission by a defendant: cannot be located upon the exercise of due diligence; has been transferred or sold to, or deposited with, a third person; has been placed beyond the jurisdiction of the Court; has been substantially diminished in value; or has been commingled with other property which cannot be subdivided without difficulty, the United States of America shall be entitled to forfeiture of substitute property, pursuant to Title 21, United States Code, Section 853(p), as incorporated by Title 18, United States Code, Section 982(b)(1), Title 28, United States Code, Section 2461(c), and Title 31, United States Code, Section 5317(c).



FORWARDED
Dated: Nov. 9, 2021

for Dan Kuaterski
RICHARD G. FROHLING
Acting United States Attorney